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April 13, 2021

**BY ECF AND E-MAIL**

Honorable Loretta A. Preska  
United States District Judge  
United States District Court for the  
Southern District of New York  
United States Courthouse  
500 Pearl Street, Room 2220  
New York, New York 10007-1312

Re: *Peterson v. Islamic Republic of Iran*, 10-cv-4518 (LAP); Dechert LLP's Invoices for  
the Period Through March 31, 2021

Dear Judge Preska:

In accordance with the Order Appointing Special Master entered June 7, 2017 (ECF No. 775; referred to herein as the "Appointing Order"), I am writing to seek approval of my invoices for time and expenses through March 31, 2021. In support of this request, I am filing this letter on the public docket, with summaries of the number of hours my associate and I recorded, and the time value recorded for each of us. As the summaries indicate, I am requesting approval for payment of \$1,199.00, representing \$1,173.60 for fees and \$25.40 for disbursements. My time was billed at the court-approved rate, which reflects an average discount of approximately 30%, and the time of the associate who worked on the matter was billed at a rate that reflects a discount of 10%, off of customary hourly rates.

Pursuant to the terms of the Appointing Order, I am providing the details behind the summaries only to the Court. I note for the record, however, that during the fourth quarter of 2020 and the first quarter of 2021, my associate and I were concerned with monitoring the Trustee's progress toward winding down the QSF.

If Your Honor finds the billing records to be in order, I respectfully request that the Court order payment of the invoice from funds in the Qualified Settlement Fund, without charging any portion of the invoice to the 13% plaintiffs, as contemplated by the Appointing Order. (*See* Appointing Order, at 6.)



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Of course, if Your Honor has any questions about the invoices submitted or any other issues concerning this action, I would be happy to address them at the Court's convenience.

Respectfully,

/s/ Kathleen N. Massey

Kathleen N. Massey

Enclosure (summary and detailed bill)

Copy to: All Counsel on ECF Service List (with summary bill)

The Court has reviewed the Special Master's invoice and finds it to be in order.

SO ORDERED.

4/14/2021

A handwritten signature in black ink that reads "Loretta A. Preska".